

Theodore Robert Bundy
Box 249
Glenwood Springs, Colorado 81601

August 23, 1977

The Honorable George E. Lohr
Pitkin County District Court
506 East Main Street
Aspen, Colorado

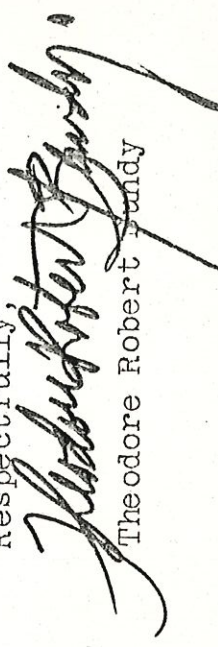
Re: Appointment of Charles V. Morton
to Assist Defendant (Criminal Action No. C-1616)

Dear Judge Lohr:

In your written order of May 31, 1977, you appointed Charles V. Morton as a consultant to me for the purpose of examining and rendering his professional opinion based on analysis and comparisons of human hair relevant to this case. You also ordered Mr. Morton to provide you with a statement that he submits to the jurisdiction of the Court for all purposes with respect to this case. Mr. Morton has not submitted such a statement because neither he nor I understand the purpose of the requested statement.

Would the Court please advise me what practical and legal effect such a statement would serve? Personally, I believe that *it* subjects the defense to a burden which the People are not subjected to. Has, for instance, the People's hair expert, Robert Neill, been required to furnish such a statement? I would very much like to know what the Court's concerns are in this matter. Both Mr. Morton and other attorneys I have consulted tell me that such a condition to appointment is unique in their experience.

Respectfully,


Theodore Robert Bundy

cc: Ken Dresner
Milton Blakey ✓

Dear Milt:

Judge Lohr is furnishing all parties a copy of the Memorandum Opinion but you will have to pick it up from our office as he does not want to place it in the mail. He has placed the original in a sealed envelope and it is not available to the public.

See you on the 14th,

Shirley

TRICT COURT
OUNTY OF PITKIN
OLORADO

on No. C-1616

ORDER

(Re: Kent and Aime Transactions)

As more fully stated in the Memorandum Opinion issued

by the Court on the date of this Order, it is found that the trans-

actions involving the disappearance of Debra Kent and the disappearance and death of Laura Ann Aime are not sufficiently similar to the transaction involving Caryn Campbell and that there is not evidence sufficient to connect defendant to either the Kent or the Aime transaction to permit evidence of either the Kent or the Aime transaction to be received in the trial of the defendant. Accordingly,

IT IS ORDERED THAT evidence of transactions involving the disappearance of Debra Kent and the disappearance and death of Laura Ann Aime may not be received in evidence in the trial of the defendant in this case.

Done this 4 day of November, 1977.

BY THE COURT:


District Judge

File Review: Nov 3, 1977

1. Exhibit W are received. - ORDER -
2. Discovery Order date May 15, 1977. -

- NO COURT REQUESTED RELIEF.
- COURT DIRECT FILING OF MOTION

X SIT DAMN. FOR SECURITY FOR HEARING. -

- CO.

12-77
MOTION FOR DETERMINATION OF HAND. -

Approved SAT. - Records of Mr. Bill - Granted

- " of Dr. Lee. Brown - Cox - NOT. REC.

Proposed Draft Granted.

Lubeck - On -

Whitman - withdrawn

Oct 21, 1977 -

(*) Tues - Nov 8 - Witness list. -

- INSPECT CRIME SCENE - Granted

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. 1616

THE PEOPLE OF THE
STATE OF COLORADO

)
)
)
)
)
)

vs.

ORDER

THEODORE ROBERT BUNDY

)

The Court having considered Defendant's Motion for Delivery of Hair Specimens to the Defense Experts and having considered the argument of counsel and the representations made to the Court, the Court finds that the People have in their custody certain evidence, evidenced by attachment "A" and incorporated herein by reference which Defendant is entitled to have examined by Charles V. Morton, Defendant's Court appointed expert. It is further ordered that with all convenient speed, said evidence be delivered to James A. Howard, Defendant's Court appointed investigator for delivery to Charles V. Morton in Oakland California. It is further ordered that said evidence be contained in properly sealed packages clearly labeled and ready for transporting; and that James A. Howard deliver in the same sealed condition as delivered to him the packaged evidence given to him.

It is further ordered that the hairs obtained from the vehicle at the Colorado Bureau of Investigation and presently in the custody of the Colorado Bureau of Investigation be turned over to James Howard in properly sealed containers at the offices of the Colorado Bureau of Investigation, Denver, Colorado, and that James ^{THE SAME TO CHARLES V. MORTON, OAKLAND CALIFORNIA.} A. Howard deliver in the same sealed condition as delivered to him the packaged evidence received by him from the Colorado Bureau of Investigation.

It is further ordered that upon Charles V. Morton's examination that he properly identify and deposit said evidence in the United States mail with postage prepaid, return receipt requested addressed to Michael J. Fisher, Chief Criminal Investigator , 506 East Main, Aspen, CO 81611.

The Court further finds that there is evidence currently in the custody of the Federal Bureau of Investigation, Washington, D.C.

which the Defendant is entitled to have examined by Mr. Morton. It is ordered that the District Attorney direct the Federal Bureau of Investigation to complete their examination of the materials in their custody and ^{DEPOSIT IN THE U.S. MAIL ADDRESSED} ~~deliver said materials~~ to the submitting agencies no later than Monday, November 7, 1977. It is further ordered that the District Attorney arrange that the Salt Lake County Sheriff's Office deliver the following evidence in their custody to Charles V. Morton no more than 72 hours after the receipt thereof:

1. All materials vacuumed from the 1968 Volkswagon

formerly owned by the Defendant.

2. ^{All} The known ~~hair~~ ^{HEAD} samples of Carol DaRonch.
3. ^{All} The known ~~hair~~ ^{HEAD + RUBIE} samples of Melissa Smith.

These specimens to include those previously compared by the Federal Bureau of Investigation and reported to be microscopically identical.

It is further ordered that upon notice to Mr. Morton of the transporting of the evidence that he will promptly examine the evidence when turned over and return the specimens to the representative of the Salt Lake County Sheriff's Office immediately upon conclusion of his examination.

Done and signed this 2nd day of November, 1977.

District Court Judge

So Ordered - by Judge Lohr.

11-2-27

ATTACHMENT "A"

INVENTORY

One brown cardboard slide holder marked "PCM 5410", "Hairs" from K-4, containing two slides.

One brown cardboard slide holder marked "Evidence from K-5 & Q20 PC-L6351, L6325", containing two slides.

One brown cardboard slide holder marked "Evidence PCL-6351, H from K-5", containing one slide.

One brown envelope "Evidence received 11/3/76 personally from Investigator Mike Fisher, 3:00 p.m. 6C-88", containing one clear plastic bag containing 6 small plastic bags marked:

6C-88 K-1/A
6C-88 K-1/B
6C-88 K2/A
6C-88 K2/B
6C-88 Q-15
6C-88 Q-20

Also containing a clear plastic bag containing 2 cardboard boxes marked "PC-M3310 Q-15 hair" and "PC-M3310 Q-20" respectively.

Received from the District Attorneys Office in Aspen, Colorado
the above described items contained in sealed box on October
____ 1977 , at _____ A.M./P.M.

Received by

Delivered by

which the Defendant is entitled to have examined by Mr. Morton. It is ordered that the District Attorney direct the Federal Bureau of Investigation to complete their examination of the materials in their custody and ~~deliver said materials~~ *transmit to the US mail address. Mr.* to the submitting agencies no later than Monday, November 7, 1977. It is further ordered that the District Attorney arrange that the Salt Lake County Sheriff's Office deliver the following evidence in their custody to Charles V. Morton no more than 72 hours after the receipt thereof:

1. All materials vacuumed from the 1968 Volkswagon

formerly owned by the Defendant.

2. The known ^{head} hair samples of Carol DaRonch.
3. The known ^{head and wrist} hair samples of Melissa Smith.

These specimens to include those previously compared by the Federal Bureau of Investigation and reported to be microscopically identical.

It is further ordered that upon notice to Mr. Morton of the transporting of the evidence that he will promptly examine the evidence when turned over and return the specimens to the representative of the Salt Lake County Sheriff's Office immediately upon conclusion of his examination.

Done and signed this 2nd day of November, 1977.


District Court Judge

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO

vs.

THEODORE ROBERT BUNDY

)
)
)
)
)
)

TENTATIVE WITNESS LIST

Pursuant to Defendant's request for a list of witnesses to be presented by the State on November 14, 1977, the following is a tentative list which in nowise is complete and the State would inform the Court that none of these witnesses will be under subpoena therefore we cannot guarantee their presence. This list will be supplemented with additional witnesses who may be called and that supplementation will be given to the Defendant by November 8, 1977.

Ira Beal
745 S. Main St.
Bountiful, Utah Police Department

William O. Collard
Bountiful Police Department
745 S. Main St.
Bountiful, Utah

Carol DaRonch
5456 S. 7th West
Salt Lake City, Utah

Paul Forbes
Policeman
5461 S. State
Murray, Utah

Bill Hyde
437 S. Second E.
Salt Lake City, Utah

Jerry Kinghorn
437 S. Second E.
Salt Lake City, Utah

Sgt. Robert Hayward
P.O. Box 304
Salt Lake City, Utah

Daryl Ondrak
437 S. Second E.
Salt Lake City, Utah

Jerry Peterman
5461 S. State
Murray, Utah

Joel Riet
5461 S. State
Murray, Utah

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO

vs.

THEODORE ROBERT BUNDY

TENTATIVE WITNESS LIST

Pursuant to Defendant's request for a list of witnesses to be presented by the State on November 14, 1977, the following is a tentative list which in nowise is complete and the State would inform the Court that none of these witnesses will be under subpoena therefore we cannot guarantee their presence. This list will be supplemented with additional witnesses who may be called and that supplementation will be given to the Defendant by November 8, 1977.

Ira Beal
745 S. Main St.
Bountiful, Utah Police Department

William O. Collard
Bountiful Police Department
745 S. Main St.
Bountiful, Utah

Carol DaRonch
5456 S. 7th West
Salt Lake City, Utah

Paul Forbes
Policeman
5461 S. State
Murray, Utah

Bill Hyde
437 S. Second E.
Salt Lake City, Utah

Jerry Kinghorn
437 S. Second E.
Salt Lake City, Utah

Sgt. Robert Hayward
P.O. Box 304
Salt Lake City, Utah

Daryl Ondrak
437 S. Second E.
Salt Lake City, Utah

Jerry Peterman
5461 S. State
Murray, Utah

Joel Riet
5461 S. State
Murray, Utah

John Bernardo
437 S. Second East
Salt Lake City, Utah

John Fife
437 S. Second East
Salt Lake City, Utah

Capt. Pete Hayward
437 S. Second East
Salt Lake City, Utah

Brian Severson
161 Serpentine Way
Sandy, Utah

Jerry Thompson
437 S. Second East
Salt Lake City, Utah

Bob Warner
437 S. Second East
Salt Lake City, Utah

Dave Yocum
437 S. Second East
Salt Lake City, Utah

Mrs. Mary Walsh
144 East 5600 South
Murray, Utah


Serge Moore
State Medical Examiner
University of Utah
Medical Center
Salt Lake City, Utah

Ron Balyntine
745 S. Main St.
Bountiful, Utah

Stephen Twitchell
437 S. Second East
Salt Lake City, Utah

At this point and Time and until we return from Utah this weekend, this is the anticipated list of witnesses. The remaining witnesses that will be added will most likely concern similar transactions.

Submitted this 2nd day of November, 1977.



Milton K. Blakey
Deputy District Attorney

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

ORDER

(Re: Appointment of Investigator)

vs.

THEODORE ROBERT BUNDY,

Defendant.

The Court has considered Defendant's Motion For Appointment Of An Additional Investigator At Public Expense, and statements and argument addressed thereto, and

FINDS THAT the People have given notice of their intention to introduce four alleged "similar transactions" all of which took place in the State of Utah; that it would be most advantageous and most productive if Defendant had the assistance of an investigator in the Salt Lake City, Utah area to do the investigation necessary to prepare a defense against these transactions; that Defendant is representing himself, is incarcerated, is indigent, and is unable to perform field investigation himself; that John Hill, Director of the Salt Lake Legal Defender Office, has given Defendant authorization to use Ed Barten, an investigator with the Legal Defender; That Mr. Barten, 343 South 600 East, Salt Lake City, Utah (phone: 801-532-5444), is a person qualified to perform work for the Defendant, is willing to accept such employment, has consulted with the Defendant in this regard, and is acceptable to the Defendant; that Mr. Barten will receive Fifteen Dollars (\$15.00) per hour plus reasonable expenses incurred during the course of his work for the Defendant.

IT IS ORDERED that Mr. Ed Barten of the Salt Lake Legal Defender Office be appointed to perform such field investigation in connection with several alleged similar transaction which occurred in Utah; that such work done by Mr. Barten shall not be redundant to work done on this case by Defendant's other investigator James A. Howard; That such appointment is to be effective upon filing by Mr. Barten of

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

vs.

THEODORE ROBERT BUNDY,

Defendant.

O R D E R

(Re: Defendant's Inspection
of Crime Scene)

On October 21, 1977, Defendant filed with the Court a Motion To Permit Defendant To Inspect the Crime Scene. The Court has considered the Motion and the statements addressed thereto, and

FINDS that the Defendant is conducting his defense pro se with the assistance of advisory counsel and investigators appointed by the Court; that he is charged with the murder of Caryn E. Campbell, who disappeared from the Wildwood Inn, Snowmass, Colorado, and whose body was discovered a short distance from the Wildwood Inn about a month later; and that it would be useful for Defendant to view the crime scene and the area from which Ms. Campbell disappeared in order that Defendant may more adequately prepare a defense, accordingly,

IT IS ORDERED that during such time as Defendant would ordinarily be escorted to the Garfield County law library to do legal research, he will instead be taken by Garfield County Sheriff's Deputies to the Wildwood Inn, Snowmass, Colorado; that he be permitted to consult with his advisory counsel, Kevin O'Reilly and Ken Drenser, and his investigator, James Howard, at the Wildwood Inn; that upon completion of the areas of the Wildwood Inn related to the Campbell case, Defendant be taken to the crime scene where Ms. Campbell's body was discovered; that the inspection tour of the Wildwood Inn and crime scene is not to exceed four (4) hours including transportation time; and that the Garfield County Sheriff arrange for Defendant's transportation to and from Snowmass, Colorado, on or before November 11, 1977.

Dated this _____ day of November, 1977.

BY THE COURT:

Judge George E. Lohr
District Court Judge

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

MOTION TO PERMIT DEFENDANT
TO INSPECT THE CRIME SCENE

vs.

THEODORE ROBERT BUNDY,

Defendant,

Comes now the Defendant, pro se, Theodore Robert Bundy,

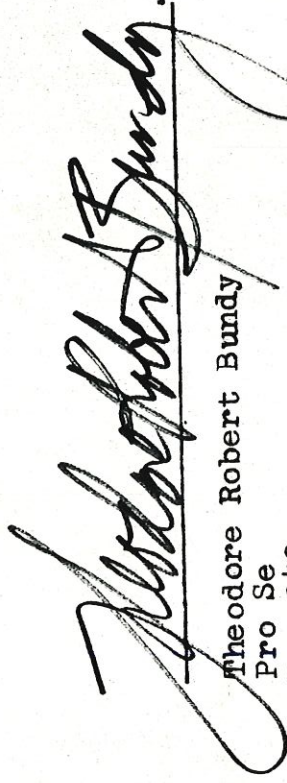
and states as follows:

Caryn Campbell, whose death is the subject of this prosecution, disappeared from the Wildwood Inn at Snowmass, Colorado, on January 12, 1975. Her body was discovered about a month later a few miles from the Wildwood Inn.

Defendant moves the Court to order the Garfield County Sheriff transport the Defendant to the Wildwood Inn and to the nearby crime scene as part of Defendant's preparation of his defense in this matter. Defendant requests that the Garfield County Sheriff be directed by the Court to accomplish Defendant's transportation to Snowmass before Friday, November 11, 1977. Defendant further requests that he be allowed to consult with his advisory counsel, Ken Dresner and Kevin O'Reilly, and his investigator, James Howard, while inspecting the crime scene and related areas.

Dated this 21st day of October, 1977.

Respectfully Submitted,


Theodore Robert Bundy
Pro Se

Box 249
Glenwood Springs, Colorado 81601

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

vs.

THEODORE ROBERT BUNDY,

Defendant.

NOTICE OF DEFENDANT'S REQUEST
THAT DISTRICT ATTORNEY PROVIDE
PRE-TRIAL HEARING WITNESS LIST
IN ADVANCE OF HEARING

On November 14, 1977, there is scheduled to be heard in the Pitkin County District Court several suppression motions and a motion in limine filed by the Defendant. Rule 16(a)(1) of the Colorado Rules of Criminal Procedure and the Court's Discovery Order of May 15, 1977, direct the District Attorney to disclose to Defendant the names, addresses, and statements of witnesses he intends to call at hearing or trial.

The only official witness list given Defendat accompanied the Information which was filed in October, 1976. In addition to that list, Defendant received from the District Attorney a letter dated March 18, 1977, addressed to Charles Liedner. This letter contained the names of witnesses the District Attorney intended to call to the preliminary hearing, but such a list does not comply with the rule or the Court's discovery order because no addressed were supplied with the list. Finally, on August 22, 1977, Defendant wrote a letter to Milton K. Blakey, Deputy District Attorney, requesting a list of witnesses he intended to call to hearings which were then scheduled for September 20, 1977. Acopy of this letter was sent to the Court. No such list has been delivered to the Defendant.

The November 14, 1977, hearings will involve a large number of witnesses, possibly one hundred and fifty, most of whom must be subpoenaed from out-of-state. It will be extremely difficult for the Defendant to begin the costly and time consuming task of asking the Court to issue certificates to out-of-state witnesses if he does not first know who the People intend to call. The burden is on the People as well as is the duty to prepare and deliver such a witness list.

Blakely

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN

STATE OF COLORADO
Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

)
)
)
)
)
)
)
Plaintiff,

vs.

ORDER

THEODORE ROBERT BUNDY,

)
)
)
)
)
)
)
Defendant.)

On October 3, 1977, the People filed an "In Camera Presentation of Non-Material Information Requested by Defendant", together with an Affidavit and a copy of case report no. 9340-74, consisting of 179 pages, prepared by the Bountiful, Utah, Police Department and relating to an attempt to locate Debra Kent.

Upon review of that case report in-camera, it is found that pages 150 through 163 thereof contain material which is not properly subject to discovery by defendant pursuant to Rule 16, Crim. P. Accordingly,

IT IS ORDERED THAT the copy of case report no. 9340-74, consisting of 179 pages, prepared by the Bountiful, Utah Police Department, and the accompanying Affidavit be sealed, to be opened only by the Court, or pursuant to its order; and

IT IS FURTHER ORDERED THAT such sealed material remain on file with the Clerk of this court as part of the record in this case; and

IT IS FURTHER ORDERED THAT pages 150 through 163 of that case report, and accompanying Affidavit, not be made available to the defendant.

Done this 26 day of October, 1977.

BY THE COURT:


District Judge

Blank
8. 10-11-77

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

STIPULATION AND AGREEMENT
FOR EXAMINATION OF HAIR
SPECIMENS

vs.

THEODORE ROBERT BUNDY,

Defendant.

Comes now The People of the State of Colorado, by and through the District Attorney, Frank G.E. Tucker and Deputy District Attorney, Milton K. Blakey, and the Defendant, Theodore Robert Bundy, pro se, and stipulate and agree as follows: That there are numerous hair specimens of known and unknown origin now in the possession and control of various law enforcement agencies which are relevant to the above-entitled action, to wit:

1. Caryn Campbell's head hair (K5) resubmitted from FBI Lab. # PC-L6351 QH on December 1, 1975, together with her pubic hair (Q20) bearing FBI Lab.# PC-L6325 QH.
2. Carol DaRonch's head hair (K4) first submitted on February 3, 1976, and given FBI Lab.# PC-M5410 KT/NX.
3. Melissa Smith pubic hair (K2) resubmitted on slides from FBI Lab.# PC-L3330 KT on December 23, 1975.
4. One red-brown head hair from trunk debris (Q15) and one red-brown head hair from floor mat (Q20) which FBI states in report dated February 9, 1976, (FBI Lab.# PC-M3907 KT) is microscopically like CARYN CAMPBELL head hair.
5. One red-brown head hair found among hairs recovered from front floor mat (Q22) which FBI states in report dated March 31, 1976, (FBI Lab.# PC-M5410 KT/NX) is microscopically like CAROL DARONCH pubic hair.
6. One pubic hair recovered from backseat and floor area (Q14) which FBI states in report dated February 3, 1976, (FBI Lab.# PC-M4487) is microscopically like MELISSA SMITH pubic hair.
7. Specimens Q13 thru Q26 which are detailed in an FBI report of December 16, 1975, (FBI Lab.# PC-M3310 KT), and which were allegedly recovered from a 1968 Volks-wagen automobile formerly owned by defendant.
8. Specimens Q28 thru Q34 which are detailed in an FBI report of March 31, 1976, (FBI Lab.# PC-M5410 KT/NX), and which were allegedly recovered from a 1968 Volks-wagen automobile formerly owned by defendant.

9. Any hair specimen not listed above which has been recovered from the above mentioned 1968 Volkswagen which has been or will be submitted for examination by the FBI or the Colorado Bureau of Identification (CBI).

10. Any head hair or pubic hair samples taken from Caryn Campbell, Laura Aime, Carol DaRonch, Debra Kent and Melissa Smith which has been or will be submitted for an examination and comparison with hair specimens recovered from defendant's previously owned 1968 Volkswagen.

This Court has appointed Charles V. Morton, whose address is 2945 Webster Street, Oakland, California, 94609, to conduct examinations for comparison of the known hair samples and questioned hair samples on behalf of the above-captioned Defendant. In order that this examination may be conducted in an efficient and expeditious manner without the destruction of the chain of custody on said samples, it is hereby stipulated and agreed as follows:

(A) That the District Attorney will cause all hair specimens listed above to be placed in appropriate packaging and in a sealed container, each specimen being separately labelled within the sealed container and given to James A. Howard of Colorado Springs, Colorado, and further, that James A. Howard will deliver the sealed container to Charles V. Morton in Oakland, California.

(B) In addition to the hair specimens given to James A. Howard, mentioned in Paragraph (A), the District Attorney is to give Mr. Howard all results of all new scientific tests and data acquired by law enforcement authorities or their agents made in connection with hair taken from Caryn Campbell, Laura Aime, Carol DaRonch, Debra Kent, and Melissa Smith. These new reports will be comprised of reports not previously given to the Defendant by the District Attorney and they will be given to Mr. Howard at the time he picks up the above-described specimens.

(C) That it is further stipulated and agreed upon that when Mr. Morton has completed his examinations, he will appropriately package all specimens and packaging received by him and return said specimens separately labelled within a sealed container and deposit

said container in the United States Mail with adequate postage paid and return receipt requested, addressed to Micheal Fisher, Chief Investigator, Pitkin County District Attorney's Office, 506 Main Street, Aspen, Colorado, 81611.

(D) That it is further stipulated and agreed that in any hearing or trial in the above-entitled action, that the Defendant will stipulate as a matter of fact that the hair specimen's received by James A. Howard at the Colorado Bureau of Investigation Offices on October 12, 1977, are the same specimens as were re-delivered by Charles V. Morton to Micheal Fisher, the authorized agent for the District Attorney.

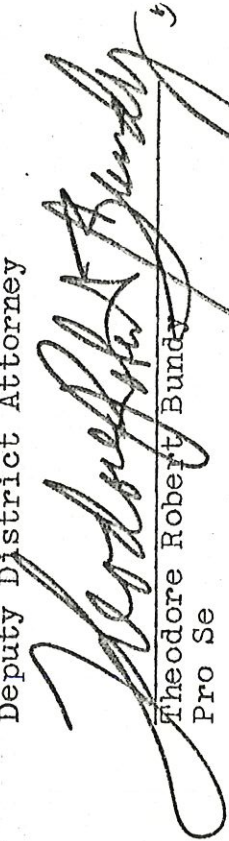
(E) And finally, that by agreeing to this stipulation, the Defendant has in no way stipulated that as a matter of fact a legitimate and verifiable chain of evidence has been maintained by the District Attorney with respect to the above-listed hair specimens prior to their delivery to James A Howard.

Respectfully Submitted,

Frank G.E. Tucker
District Attorney

By

Milton K. Blakey
Deputy District Attorney


Theodore Robert Bundy
Pro Se

Dated October 17, 1977.

R. 10- 11-77

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

STIPULATION AND AGREEMENT
FOR EXAMINATION OF HAIR
SPECIMENS

vs.

THEODORE ROBERT BUNDY,

Defendant.

Comes now The People of the State of Colorado, by and through the District Attorney, Frank G.E. Tucker and Deputy District Attorney, Milton K. Blakey, and the Defendant, Theodore Robert Bundy, pro se, and stipulate and agree as follows: That there are numerous hair specimens of known and unknown origin now in the possession and control of various law enforcement agencies which are relevant to the above-entitled action, to wit:

1. Caryn Campbell's head hair (K5) resubmitted from FBI Lab. # PC-L6351 QH on December 1, 1975, together with her pubic hair (Q20) bearing FBI Lab.# PC-L6325 QH.
2. Carol DaRonch's head hair (K4) first submitted on February 3, 1976, and given FBI Lab.# PC-M5410 KT/NX.
3. Melissa Smith pubic hair (K2) resubmitted on slides from FBI Lab.# PC-L3330 KT on December 23, 1975.
4. One red-brown head hair from trunk debris (Q15) and one red-brown head hair from floor mat (Q20) which FBI states in report dated February 9, 1976, (FBI Lab.# PC-M3907 KT) is microscopically like CARYN CAMPBELL head hair.
5. One red-brown head hair found among hairs recovered from front floor mat (Q22) which FBI states in report dated March 31, 1976, (FBI Lab.# PC-M5410 KT/NX) is microscopically like CAROLSDARONCH pubic hair.
6. One pubic hair recovered from backseat and floor area (Q14) which FBI states in report dated February 3, 1976, (FBI Lab.# PC-M4487) is microscopically like MELISSA SMITH pubic hair.
7. Specimens Q13 thru Q26 which are detailed in an FBI report of December 16, 1975, (FBI Lab.# PC-M3310 KT), and which were allegedly recovered from a 1968 Volks-wagen automobile formerly owned by defendant.
8. Specimens Q28 thru Q34 which are detailed in an FBI report of March 31, 1976, (FBI Lab.# PC-M5410 KT/NX), and which were allegedly recovered from a 1968 Volks-wagen automobile formerly owned by defendant.

Stipulation
Page 2.

9. Any hair specimen not listed above which has been recovered from the above mentioned 1968 Volkswagen which has been or will be submitted for examination by the FBI or the Colorado Bureau of Identification (CBI).

10. Any head hair or pubic hair samples taken from Caryn Campbell, Laura Aime, Carol DaRonch, Debra Kent and Melissa Smith which has been or will be submitted for an examination and comparison with hair specimens recovered from defendant's previously owned 1968 Volkswagen.

This Court has appointed Charles V. Morton, whose address is 2945 Webster Street, Oakland, California, 94609, to conduct examinations for comparison of the known hair samples and questioned hair samples on behalf of the above-captioned Defendant. In order that this examination may be conducted in an efficient and expeditious manner without the destruction of the chain of custody on said samples, it is hereby stipulated and agreed as follows:

(A) That the District Attorney will cause all hair specimens listed above to be placed in appropriate packaging and in a sealed container, each specimen being separately labelled within the sealed container and given to James A. Howard of Colorado Springs, Colorado, and further, that James A. Howard will deliver the sealed container to Charles V. Morton in Oakland, California.

(B) In addition to the hair specimens given to James A. Howard, mentioned in Paragraph (A), the District Attorney is to give Mr. Howard all results of all new scientific tests and data acquired by law enforcement authorities or their agents made in connection with hair taken from Caryn Campbell, Laura Aime, Carol DaRonch, Debra Kent, and Melissa Smith. These new reports will be comprised of reports not previously given to the Defendant by the District Attorney and they will be given to Mr. Howard at the time he picks up the above-described specimens.

(C) That it is further stipulated and agreed upon that when Mr. Morton has completed his examinations, he will appropriately package all specimens and packaging received by him and return said specimens separately labelled within a sealed container and deposit

Stipulation
Page 3.

said container in the United States Mail with adequate postage paid and return receipt requested, addressed to Micheal Fisher, Chief Investigator, Pitkin County District Attorney's Office, 506 Main Street, Aspen, Colorado, 81611.

(D) That it is further stipulated and agreed that in any hearing or trial in the above-entitled action, that the Defendant will stipulate as a matter of fact that the hair specimen's received by James A. Howard at the Colorado Bureau of Investigation Offices on October 12, 1977, are the same specimens as were re-delivered by Charles V. Morton to Micheal Fisher, the authorized agent for the District Attorney.


(E) And finally, that by agreeing to this stipulation, the Defendant has in no way stipulated that as a matter of fact a legitimate and verifiable chain of evidence has been maintained by the District Attorney with respect to the above-listed hair specimens prior to their delivery to James A Howard.

Respectfully Submitted,

Frank G.E. Tucker
District Attorney

By

Milton K. Blakey
Deputy District Attorney


Theodore Robert Bundy
Pro Se

Dated October 17, 1977.